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5 Attorney for Plaintiff

6 UNITED STATES OF AMERICA  
7  
8 DISTRICT OF NEVADA

9 ISRAEL GARCIA, JR.,

2:18-cv-00191-JCM-GWF

10 Plaintiff,

11 vs.

**STIPULATED DISCOVERY PLAN  
AND SCHEDULING ORDER;  
SUBMITTED IN COMPLIANCE WITH  
LR 26-1(b)**

12 CREDIT ONE BANK, N.A.,

13 Defendant.  
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17 Pursuant to Fed R. Civ. P. 26 and LR 26-1, Plaintiff ISRAEL GARCIA, JR. and Defendant  
18 CREDIT ONE BANK, N.A., through their counsel, submit the following Stipulated Discovery  
19 Plan and Scheduling Order for this Court's review and approval.  
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21 1. **Fed. R. Civ. P. 26(f) Meeting:** The parties met for a Fed. R. Civ. P. 26(f) conference  
22 on June 12, 2018.

23 2. **Discovery Plan:** Discovery will be needed concerning the allegations in the  
24 Complaint.

25 a. **Initial Disclosures:** The parties will make their respective Fed. R. Civ. P.  
26 26(a)(1) initial disclosures by June 26, 2018.  
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- 1                   b. **Discovery Cut-Off Date LR 26-1(e)(1):** All discovery shall be completed by

2                   November 1, 2018.
- 3                   c. **Fed. R. Civ. P. 26(a)(2) Expert Disclosures (LR 26-1(e)(3)):** Disclosure of

4                   experts shall proceed according to Fed R. Civ. P. 26(a)(2) except that, pursuant

5                   to Local 26-1(e)(3):

  - 6                   i. The disclosure of the parties' initial experts and expert reports shall

7                   occur on September 4, 2018, which is 60 days prior to the close of

8                   discovery, and;
  - 9                   ii. The disclosure of the parties' rebuttal experts and expert reports shall

10                  occur on October 4, 2018, which is 32 days after the parties' disclosure

11                  of initial experts.
- 12                  3. **Amending the Pleadings and Adding Parties (LR 26-1(e)(2)):** The parties shall have

13                  until August 3, 2018 to file any motions to amend the pleadings or add parties, which is

14                  90 days before the discovery cut-off date.
- 15                  4. **Dispositive Motions (LR 26-1(c)(4)):** The parties shall have until December 3, 2018 to

16                  file dispositive motions, which is 30 days after the completion of discovery.
- 17                  5. **Pretrial Order (LR 26-01(e)(5)-(6)):** The joint pretrial order shall be filed by January

18                  3, 2019, which is not more than 30 days after the date set for filing dispositive motions

19                  in this case. If dispositive motions are filed, the date for filing the joint pretrial order

20                  shall be suspended by thirty (30) days after the decision on the dispositive motions or

21                  by further order of the Court. The disclosures required by Fed. R. Civ. P. 26(a)(3) shall

22                  be included in the joint pretrial order.

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- 1       6. **Interim Status Report (LR 26-3):** The parties shall file the interim status report  
2       required by LR 26-3 by September 4, 2018, which is not later than 60 days before the  
3       discovery cut-off.
- 4       7. **Alternate Dispute Resolution.** The parties certify that they have met and conferred  
5       about the possibility of using alternative dispute-resolution processes, including  
6       mediation, arbitration, and if applicable, early neutral evaluation.
- 7       8. **Alternate Forms of Case Disposition.** The parties certify that they considered consent  
8       to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed R. Civ. P. 73 and use of  
9       the Short Trial Program (General Order 2013-01).
- 10      9. **Electronic Evidence.** The parties certify that they have discussed whether they intend  
11      to present evidence in electronic format to jurors for the purposes of jury deliberations.  
12      At this time, the parties do not intend to present evidence in electronic format to the  
13      jury.  
14      At this time, the parties do not intend to present evidence in electronic format to the  
15      jury.

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